

1 JOHN E. PEER - State Bar No. 95978  
jpeer@woollspeer.com  
2 GREGORY B. SCHER - State Bar No. 137228  
gscher@woollspeer.com  
3 **WOOLLS & PEER**  
A Professional Corporation  
4 One Wilshire Boulevard, 22<sup>nd</sup> Floor  
Los Angeles, California 90017  
5 Telephone: (213) 629-1600  
Facsimile: (213) 629-1660

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7 Attorneys for Plaintiff and Counterclaim-Defendant  
CENTURY SURETY COMPANY

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10 **UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

11 CENTURY SURETY COMPANY,

12 Plaintiff,

13 v.

14 CAL-REGENT INSURANCE SERVICES  
15 CORPORATION and STATE NATIONAL  
INSURANCE COMPANY, INC.,

16 Defendants.

17 CAL-REGENT INSURANCE SERVICES  
18 CORPORATION,

19 Counter-claimant,

20 v.

21 CENTURY SURETY COMPANY,

22 Counter-Defendant.

Case No.: 13CV1488-JM-JMA

Hon. Jeffrey T. Miller

**CENTURY SURETY COMPANY'S  
OBJECTIONS TO DEFENDANT  
CAL-REGENT INSURANCE  
SERVICES CORPORATION'S PRE-  
TRIAL DISCLOSURES**

Filing Date: 6/27/13  
Trial Date: 3/21/16  
Discovery Cut-off: 4/3/15  
Motion Filing Cut-off: 7/17/15

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25 Plaintiff and Counter-Defendant Century Surety Company ("Century") submits  
26 the following Objections to Defendant Cal-Regent Insurance Services Corporation's  
27 Pre-Trial Disclosures.  
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1      **I.    OBJECTIONS TO TRIAL EXHIBITS**

2 <u>Exhibit</u>	2 <u>Objection</u>
3      Exh. No. __: 4      Century Surety's claims file showing 5      Century Surety's handling of Brian 6      Walderson's potential claim and State 7      National's claim and Century Surety's 8      bad faith in the handling of both claims. 9 10	The exhibit is insufficiently defined. The claim file is not a single document, but rather a compilation of many different documents. As a result, Plaintiff is unable to determine which document or documents Defendant intends to offer at trial, and is further unable to determine what other objections, if any, may exist.
11     Defendant's Exh. No. __: 12     Century Surety's underwriting file 13     showing Century Surety's handling of 14     Brian Walderson's potential claim and 15     State National's claim and Century 16     Surety's bad faith in the handling of both 17     claims. 18	The exhibit is insufficiently defined. The underwriting file is not a single document, but rather a compilation of many different documents. As a result, Plaintiff is unable to determine which document or documents Defendant intends to offer at trial, and is further unable to determine what other objections, if any, may exist.
19     Defendant's Exh. No. __: 20     Vista Claims file relating to the lawsuit 21     and claim by Brian Walderson against 22     Sullivan Car Company. 23 24 25 26	The exhibit is insufficiently defined. The claim file is not a single document, but rather a compilation of many different documents. As a result, Plaintiff is unable to determine which document or documents Defendant intends to offer at trial, and is further unable to determine what other objections, if any, may exist.
27     Defendants Exh. No. __: 28     Email correspondence between Richard	The exhibit is insufficiently defined. The "Email correspondence" is not

1	Nagby and State National regarding the lawsuit and claim by Brian Walderson against Sullivan Car Company.	sufficiently identified so as to enable Plaintiff to determine which document or documents Defendant intends to offer at trial, or to determine what other objections, if any, may exist.
6	Defendants Exh. No. __:  Plaintiff's Initial Rule 26.1 Disclosure Statement in the matter of Walderson v. State National Ins. Co., et al, Superior Court of State of Arizona, Maricopa County, Case Number CV2010-034067	Hearsay; improper opinion.
12	Defendants Exh. No. __:  April 24, 2012 letter from Burch & Cracchiolo and its attachment	Hearsay; improper opinion; foundation.
15	Defendants Exh. No. __:  January 30, 2013 letter from Gruber, Hurst, Johansen, Hail, Shank to Century Surety Group.	Hearsay; relevance; improper opinion; foundation.
19	Defendants Exh. No. __:  February 7, 2013 letter from Meagher & Greer to Gruber, Hurst, Johansen, Hail, Shank	Hearsay; relevance; improper opinion; foundation.

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24 **II. OBJECTIONS TO DEPOSITION TESTINONY**

<u>Deposition</u>	<u>Objection</u>
26 27 28 1. Michael Burke	Insufficient designation to alert Plaintiff to the testimony being designated.

1	2.	Anthony Modd	Insufficient designation to alert Plaintiff to the testimony being designated.
3	4	3. Traci McGuire	Insufficient designation to alert Plaintiff to the testimony being designated.

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7 DATED: February 5, 2016  
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WOOLLS & PEER  
A Professional Corporation

10  
11 /s/ Gregory B. Scher \_\_\_\_\_  
12 JOHN E. PEER  
13 GREGORY B. SCHER  
14 Attorneys for Plaintiff and Counterclaim-  
15 Defendant  
16 CENTURY SURETY COMPANY  
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## PROOF OF SERVICE

Century Surety Company v. Cal-Regent Insurance Services Corporation, et al.  
**Case No. 13-cv-1488-JM-JMA**

I, Kristy Ortega, declare:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Woolls & Peer, A Professional Corporation, One Wilshire Boulevard, 22<sup>nd</sup> Floor, Los Angeles, California 90017. On February 5, 2016, I served the document(s) described as **CENTURY SURETY COMPANY'S OBJECTIONS TO DEFENDANT CVAL-REGENT INSURANCE SERVICES CORPORATION'S PRE-TRIAL DISCLOSURES** on the interested parties in this action as follows:

- By placing  the original  a true copy thereof enclosed in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

- BY MAIL: I am "readily familiar" with this firm's practice for the collection and the processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, the correspondence would be deposited with the United States Postal Service at One Wilshire Boulevard, 22<sup>nd</sup> Floor, Los Angeles, California 90017 with postage thereon fully prepaid the same day on which the correspondence was placed for collection and mailing at the firm. Following ordinary business practices, I placed for collection and mailing with the United States Postal Service such envelope at One Wilshire Boulevard, 22<sup>nd</sup> Floor, Los Angeles, California 90017.
  - OVERNIGHT DELIVERY: I deposited such envelope in a facility regularly maintained by FEDERAL EXPRESS UPS Overnight Delivery [specify name of service: ] with delivery fees fully provided for or delivered the envelope to a courier or driver of FEDERAL EXPRESS UPS OVERNIGHT DELIVERY [specify name of service: ] authorized to receive documents at One Wilshire Boulevard, 22<sup>nd</sup> Floor, Los Angeles, California 90017 with delivery fees fully provided for.
  - BY FACSIMILE: I sent via facsimile a copy of said document(s) to the following addressee(s) at the following number(s) in accordance with the written confirmation of counsel in this action.
  - VIA ELECTRONIC SERVICE: At the time of electronic filing, on February 5, 2016, a PDF copy of said document(s) was transmitted to the following addressee(s) on the attached service list through the court's CM/ECF electronic filing system to the email addresses which said addressee(s) had provided to the CM/ECF electronic filing program.
  - [State] I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
  - [Federal] I declare that I am employed in the offices of a member of the State Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on February 5, 2016 at Los Angeles, California

Kristy Ortega

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SERVICE LIST

2 Eric R. Ginder, Esq. GINDER LAW GROUP 120 Tustin Ave., Ste. C-1095 Newport Beach, CA 92663	3 Attorneys for Defendant/Counterclaimant CAL-REGENT INSURANCE SERVICES CORPORATION  4 Telephone: (949)287-5540 x 102 Facsimile: (949)287-4241 E-mail: eginder@lglawcon.com
5 Jeffrey S. Barron, Esq. 6 Gary A. Hamblet, Esq. 7 MORRIS POLICH & PURDY LLP 8 1055 West Seventh Street, 24th Floor 9 Los Angeles, CA 90017	10 Attorneys for Defendant 11 STATE NATIONAL INSURANCE 12 COMPANY, INC.  13 Telephone: (213) 891-9100 14 Facsimile: (213) 488-1178 15 E-mail: GBarron@mpplaw.com GHamblet@mpplaw.com
16 Mark E. Hellenkamp, Esq. 17 MORRIS POLICH & PURDY LLP 18 600 West Broadway, Suite 500 19 San Diego, California 92101	20 Attorneys for Defendant 21 STATE NATIONAL INSURANCE 22 COMPANY, INC.  23 Telephone: (619) 557-0404 24 Facsimile: (619) 557-0460 25 E-mail: mhellenkamp@mpplaw.com